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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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1200 Sixth Avenue
Seattle, Washington 98101

May 5, 1997

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Program Management

Reply To
Attn Of: HW-113

Nolan R. Jensen, Acting Manager
Environmental Restoration Program
Department of Energy
Idaho Operations Office
850 Energy Drive
Idaho Falls, Idaho 83401-1563

Re: Comments on Draft Track 2 Summary Report and Final Removal Action Report for WAG 10-3.

Dear Mr. Jensen:

Enclosed are the EPA comments on the subject Summary Report. If you have any questions, please contact me at 206-553-8633.

Sincerely,

Richard Poeton, WAG 10 Manager

encl

cc: P. Kroupa, DOE ID
S. Rosenberger, IDHW, 900 N. Skyline, Idaho Falls, ID, 83402, w/encl
D. Nygard, IDHW, 1410 N. Hilton, Boise, ID 83706, w/encl
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EPA Comments on Draft Track 2 Summary Report and Final Removal Action Report for WAG 10-3.

1. Table 25

The footnote to the Jupiter Mine justifies the probability level based in part on future institutional controls. While it may be appropriate to assign a probability of "Extremely Unlikely" based on inacessibility, the Track 2 should not presume institutional controls that have yet to be decided.

2. Figure 10

The copy of this Figure does not distinguish among high, medium, and low risks. All are indicated by the same solid dark squares.

3. Table 26.

Consistent with Section 5.4, the "no action" recommendations in this table should be clarified to state "no immediate or near term action: carry forward to 10-04 RI/FS".

4. Page 112.

From a CERCLA point of view, I disagree with the assignment of lower consequence levels to accidents involving only INEEL employees. CERCLA risk assessments, for instance, evaluate current and future worker scenarios using the same risk criteria as used for the general public.

5. Page 109, last paragraph.

Regarding the second sentence in this paragraph, I do not think probability of accident should be based on assumptions about actions or decisions later in the remedial process. This should be a "baseline risk" approach.

It makes sense that sites known or suspected to contain ordnance should be assigned a higher probability of accident than those which show no signs of past ordnance activity. Sites where surface and subsurface removal actions have taken place, however, should be designated "unlikely" since they have definite signs of past activity, and therefore should bear a burden of proof that is unlikely to me met by any but the most thorough and comprehensive clearance.

6. The "EOD FTL's Recommended Action at Site" sections do not include a statement regarding final determination during the 10-04 RI/FS in Sections 2.1.8, 2.10.8, 2.11.8, 2.21.8, 2.23.8, or 2.29.8.

7. Table 5

The risks calculated for TNT and RDX in this Table do not appear to be consistent with the RBC's described at the top of page 56. For instance, 20.1 mg/kg TNT shows a risk in Table 5 of 3E-5 (residential soil ingestion), while page 56 and Appendix F (Table 2b) have 21 mg/kg corresponding to 1E-6. Similar problems also appear in the other risk tables.

8. Table 20

Based on the Oral SF and Oral RfD data for TNT in Table 18, TNT HQ's for soil ingestion in Table 20 and other tables do not appear to be consistent with the cancer risks for the soil concentrations provided. Based on Table 18, concentrations resulting in ingestion cancer risks around 1E-5 should have HQ's around 1 for TNT. Groundwater ingestion risks and HQ's in Table 20 are consistent with approximation. The HQ's shown for soil ingestion, however, are considerably lower than expected by comparison to the soil ingestion cancer risks. This is also the case with the other risk tables.